

Exhibit C



Jonathan Sidney <jsidney@climatedefenseproject.org>

Wagner Discovery Responses

Rogers, Austin D. <ARogers@babstcalland.com>

Tue, May 27, 2025 at 4:51 PM

To: Jonathan Sidney <jsidney@climatedefenseproject.org>

Cc: "William V. DePaulo, Esq." <william.depaulo@gmail.com>, "Miller, Timothy M." <TMiller@babstcalland.com>, "Markins, Kristi" <KMarkins@babstcalland.com>

Thanks, Jonathan.

Confirming email service is fine. I will also assume we can serve our responses via email as well.

Thanks,

From: Jonathan Sidney <jsidney@climatedefenseproject.org>

Sent: Tuesday, May 27, 2025 3:22 PM

To: Rogers, Austin D. <ARogers@babstcalland.com>

Cc: William V. DePaulo, Esq. <william.depaulo@gmail.com>; Miller, Timothy M. <TMiller@babstcalland.com>; Markins, Kristi <KMarkins@babstcalland.com>

Subject: Re: Wagner Discovery Responses

ATTENTION: Email sent from outside Babst Calland.

Austin,

Following up on our call just now. First, please confirm as indicated that you consent to service of our discovery responses via email.

Second, given what we view as the significant overuse of the confidentiality designation in the Southern District case, we are unwilling to agree to a blanket protective order at this time. If you have a more limited and narrowly tailored request we would consider it (though we will have to run it by Jerome and may or may not be able to get you a firm answer today).

Third, confirming that per our discussion, we will accept only the documents specifically enumerated in MVP's Initial Disclosures at Section B (Items 1-4) at a later date and will not object to their disclosure as untimely so long as we receive them sufficiently in advance of any depositions to prepare and make reasonable use of them. However, this agreement does not apply to any other documents.

Thanks and please let me know if you have any other questions, or if there are other issues we discussed that should be memorialized.

Jonathan

On Tue, May 27, 2025 at 11:48 AM Rogers, Austin D. <ARogers@babstcalland.com> wrote:

Bill/Jonathan,

In looking to respond to discovery today we realized we don't have a protective order entered in this case. Attached is the same one we entered into in Tuhus, with an accompanying Motion. Do we have your permission to file the attached?

Thanks,

Austin D. Rogers (He/Him/His)
Attorney at Law
arogers@babstcalland.com

Babst | Calland
Attorneys at Law

Truist Place, Suite 1000
300 Summers Street
Charleston, WV 25301
☎ 681.205.8888
📠 681.265.1368
www.babstcalland.com